



March 11, 2019

Grocery Manufacturers Association Testimony before the Connecticut General Assembly Joint Committee on Environment on Connecticut House Bill 7295, An Act Concerning A Recycling Program for Paper and Packaging and Requiring Certain Municipal Solid Waste Management Goals.

On behalf of the Grocery Manufacturers Association (GMA), I would like to register our opposition to CT HB 7295, an act concerning a recycling program for paper and packaging and requiring certain municipal solid waste management goals. This legislation promotes regulatory and tax structures designed to simply shift the cost of solid waste management and recycling onto the backs of businesses and consumers. It conflicts with the recommendations of the Consumer Packaging Reduction Taskforce and creates an onerous bureaucracy and reporting structure. GMA applauds holistic waste management strategies that encourage innovation, implement recycling best practices, educate consumers, and address waste, but we do not believe that this legislation accomplishes that goal.

The Grocery Manufacturers Association represents the world's leading consumer packaged goods companies. The CPG industry plays a unique role as the single largest U.S. manufacturing employment sector, delivering products vital to the wellbeing of people's lives every day. GMA's mission is to empower the industry to grow and thrive.

HB 7295 establishes a new product stewardship, or extended producer responsibility (EPR) program. These schemes are both unnecessary for materials with existing recycling systems, such as consumer packaging, and create a new taxing power and a highly prescriptive new bureaucracy. Consumer products packaging is some of the most recycled material in the solid waste management system, according to the US EPA's most recent Advancing Sustainable Materials Management report. Policies should encourage consumers to recycle even more of that packaging, rather than creating a new bureaucracy and cost structure.

Holistic management systems cannot be achieved by producers alone: businesses, consumers, and the existing waste management infrastructure need to work together. A government prescribed compliance program with the cost of the collection and recycling of products borne completely by the manufacturer with fees paid to a producer responsibility organization, is not a holistic solution nor an economical one.

Most critically, EPR does not achieve its often-stated goals. A study by the firm SAIC found that EPR for packaging: does not cause changes in packaging design, is not necessary to achieve high recycling rates, and is inefficient and only increases costs.

Manufacturers are committed to sustainability in all we do. Packaging redesign initiatives are on track to reduce packaging by 2.5 billion pounds by 2020 and increase recycled content. Innovation and the drive to optimize packaging materials have come from industry. None of this progress would be considered in the criteria laid out in the bill.

Further, the recommendations of the Consumer Packaging Reduction Taskforce, established in 2017 by an act of this legislature to identify solutions for managing waste and recycling in the state, did not include EPR. The Taskforce was made up of experts in supply chain, waste management, and recycling. The group identified many solutions, including proven best practices such as consumer education, pay-as-you-throw, and incentives. The Taskforce also recommended using the approximately \$30 million in unclaimed funds from the Connecticut bottle redemption program to improve recycling and waste management in the state. None of these recommendations are reflected in HB 7295. This is a missed opportunity to implement policies that holistically address materials management in the state.

The practical implications of HB 7295 would be the creation of a new bureaucratic system and the imposition of a number of onerous reporting requirements on consumer product companies, waste haulers, and municipalities. These requirements are not only costly but would distract from efficiently and effectively managing and improving recycling and reducing waste to landfill in Connecticut.

In conclusion, manufacturers will continue their sustainability efforts and we should avoid layering costly new programs over the top of the existing system. A holistic approach to sustainable waste management is necessary if we are truly to reach a goal of a minimal environmental impact. This legislation will simply divert private funds into meeting complex new regulatory requirements while serving only to stifle innovation.

For questions or additional information, please contact:

Greg Costa, Senior Director, State Affairs, Grocery Manufacturers Association
mobile: 703-967-7175, gcosta@gmaonline.org
or

Meghan Stasz, Vice President, Packaging and Sustainability, Grocery Manufacturers Association
ph: 571-378-6760, mstasz@gmaonline.org